

REMARKS

Reconsideration is respectfully requested.

Entry of the above amendments is courteously requested in order to place all claims in this application in allowable condition and/or to place the non-allowed claims in better condition for consideration on appeal.

Claims 10 and 11 remain in this application. Claims 1 through 9 and 12 have been cancelled. No claims have been withdrawn or added.

Paragraphs 1 through 3 of the Office Action

Claims 1 through 5 and 7 through 9 have been rejected under 35 U.S.C. Section 103(a) as being unpatentable over Peters in view of Dagle.

Claims 10 through 12 been rejected under 35 U.S.C. Section 103(a) as being unpatentable over Peters in view of Dagle.

Claim 10 requires "wherein each said sensor of said plurality of sensors is a light-sensitive detector actuated when said sensor is exposed to light" and "wherein each said sensor of said plurality of sensors *is mounted on said bottom wall of said compartment* of said tray such that placement of paper money in said compartment blocks light from reaching said sensor and removal of paper money from the compartment exposes said sensor to light".

It is conceded in the rejection of the Office Action that:

Peters discloses all the limitations above but fails to disclose each sensor of plurality of sensors is a light sensitive detector actuated when sensor is exposed to light; wherein each sensor of plurality of sensors is mounted on bottom wall of compartment of tray such that placement of paper money in compartment blocks light from reaching sensor and removal of paper money from the compartment exposes sensor to light.

It is then alleged that:

However, Dagle discloses each sensor of plurality of sensors is a light sensitive detector actuated when sensor is exposed to light; wherein each sensor of plurality of sensors is mounted on bottom wall of compartment of tray such that placement of paper money in compartment blocks light from reaching sensor and removal of paper money from the compartment exposes sensor to light (fig. 1-fig. 8; col. 3, lines 45-75; col. 4, lines 8-27).

However, it is noted that the Dagle patent discloses an assembly 186 that is positioned on top of the bottom wall of the cash drawer, and is not in any way "mounted on the bottom wall the said compartment", as required by claim 10. Furthermore, it is then contended that:

Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to incorporate Dagle's plurality of sensors in Peters. Doing so would detect accurately the removal of the entire stack of bills by a teller in response to the demand of a bank robber thereby triggering an alarm to apprise security of the existence of the emergency so preventing unauthorized removal of the contents of the drawer as taught by Dagle (abstract).

However, the Peters patent is solely directed to the marking of money taken from a cash drawer, and has no provision for or object to provide any triggering of any alarm upon removal of the money from the cash drawer. It is submitted that one of ordinary skill in the art would not be motivated to add an alarm system, such as is discussed in Dagle, to the Peters system of marking money taken from a cash drawer. Further, it is submitted that the modification of the Peters system with the Dagle apparatus as suggested in the rejection of the Office Action would violate one of the primary objects of the Peters invention stated at col. 1, lines 22 through 25 that the invention easily installed:

A further object of the invention is the provision of a device for marking for identification of the contents of a cash register drawer which may easily be installed in existing equipment.

Thus, it is an object of Peters invention to provide an assembly that is easily installed, which is further explained in Peters at col. 4, lines 23 through 30:

Since only a minimum amount of modification of the structure of the drawer is required to install the marking device of the present invention, the device may be easily installed in existing equipment. To do so, it is merely necessary to provide two holes in the floor 46 of the tray 14 to receive the screws which mount the enclosure 32 and a hole through each partition to receive the distribution manifold 34.

Since the Dagle system clearly involves a much more complex system for installing on a cash drawer, it is submitted that one of ordinary skill in the art would not be motivated to modify the Peters money marking system with the alarm system of the Dagle patent, as suggested in the rejection of claim 10 in the Office Action.

It is therefore submitted that the cited patents, and especially the allegedly obvious combination of Peters and Dagle set forth in the rejection of the Office Action, would not lead one skilled in the art to the applicant's invention as required by claim 10.

Withdrawal of the §103(a) rejection of claims 1 through 5 and 7 through 9 is therefore respectfully requested.

CONCLUSION

In light of the foregoing amendments and remarks, early reconsideration and allowance of this application are most courteously solicited.

Respectfully submitted,

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